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7 Attorneys for Defendants, Counterclaimants, and
8 Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER, LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 SHAKEY'S PIZZA ASIA VENTURES,
16 INC, a Philippines corporation,

17 Plaintiff,

18 vs.

19 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

15
16 **DECLARATION OF TODD M.
17 MALYNN REGARDING
18 UNAUTHORIZED FILING OF
19 DKT NOS. 265-266**

20 Complaint Filed: May 31, 2024
21 Trial Date: August 18, 2025

1 limited liability company and DOES 1
2 through 100, inclusive,

3 Defendants.

4 PCJV USA, LLC, a Delaware limited
5 liability company; PCI TRADING LLC, a
6 Delaware limited liability company;
7 POTATO CORNER LA GROUP LLC, a
8 California limited liability company; GK
9 CAPITAL GROUP, LLC, a California
10 limited liability company; NKM CAPITAL
11 GROUP LLC, a California limited liability
12 company; and GUY KOREN, an individual,

13 Counter-Claimants,

14 v.

15 SHAKEY'S PIZZA ASIA VENTURES,
16 INC, a Philippines corporation,

17 Counter Defendant.

18 PCJV USA, LLC, a Delaware limited
19 liability company; PCI TRADING LLC, a
20 Delaware limited liability company;
21 POTATO CORNER LA GROUP LLC, a
22 California limited liability company; GK
23 CAPITAL GROUP, LLC, a California
24 limited liability company; NKM CAPITAL
25 GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

26 Third Party Plaintiffs,

27 v.

28 PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
INTERNATIONAL USA, INC., a California
corporation; CINCO CORPORATION, a
Philippines corporation; and ROES 1 through
10, inclusive,

29 Third Party Defendants.

1 **DECLARATION OF TODD M. MALYNN**

2 I, Todd M. Malynn, declare as follows:

3 1. I am a partner at Blank Rome LLP, counsel of record for Defendants,
4 Counterclaimants, and Third Party Plaintiffs (collectively, “PCJV USA Parties”). I
5 have personal knowledge of the facts set forth in this declaration, and if called upon
6 to testify under oath, I could and would testify competently thereto.

7 2. On behalf of PCJV USA Parties, I have been working with Messrs.
8 Arash Beral and Jamison Gilmore in responding to the Court’s Order resulting from
9 the August 8, 2025 Final Pretrial Conference (Dkt. No. 254) (the “Order”).

10 3. I have been involved in the preparation of all pre-trial filing documents,
11 except the “Parties’ Challenged Exhibits Table” (Dkt. No. 265) and the “Parties
12 Challenged Exhibits, Objections and Responses” (Dkt. No. 266) filed today.

13 4. I was not involved in the preparation of hard copy or electronic copies
14 of trial exhibits. Nor did I interface with opposing counsel regarding Exhibits.

15 5. Messrs. Beral and Gilmore handled all aspects in preparing to file
16 documents Ordered to be filed in the “Challenged Exhibits” section of the Order,
17 including: (1) interfacing with counsel for Plaintiff, Counter Defendants, and Third
18 Party Defendants (“SPAVI Parties”) regarding trial exhibits and objections thereto;
19 (2) researching and preparing objections to SPAVI Parties’ trial exhibits; and (3)
20 researching and preparing responses to SPAVI Parties’ objections to Defendants’
21 trial exhibits.

22 6. Mr. Beral’s Declaration filed at approximately 5:15 p.m. today (Dkt.
23 No. 264) addressed PCJV USA Parties’ diligence in preparing and circulating PCJV
24 USA Parties’ portion of the Court-Ordered binder and amended list of challenged
25 Exhibits under item 4, titled “Challenged Exhibits,” of the Order.

26 7. At approximately 5:51 p.m. this evening, I received an ECF notification
27 of a filing entitled “Parties Challenged Exhibits Table,” bearing a Blank Rome LLP
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caption page and my electronic signature. *See* Dkt. No. 265. I did not authorize this filing.

8. At approximately 6:08 p.m. this evening, I received another ECF notification of a filing entitled “Parties Challenged Exhibits, Objections and Responses,” bearing a Blank Room LLP caption page and without a signature of any attorney from Blank Rome. *See* Dkt. No. 266. The document is signed only by Mr. Michael Murphy.

9. I have spoken with all of PCJV USA Parties' counsel of record. PCVJ USA Parties' counsel, including myself, did not authorize the filing of Dkt. Nos. 265-266. Nor did we see proposed drafts from SPAVI Parties' counsel—rough or final—of either of these documents before they were filed.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct. Executed on Auguust 14, 2025, in Los Angeles, California.

/s/ Todd M. Malynn
Todd M. Malynn

CERTIFICATE OF SERVICE

The undersigned certifies that on August 14, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.
Executed on August 14, 2025.

By: /s/AJ Cruickshank